

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

ALLSTATE INSURANCE COMPANY;
ALLSTATE FIRE AND CASUALTY
INSURANCE COMPANY; and ALLSTATE
PROPERTY AND CASUALTY
INSURANCE COMPANY; ESURANCE
INSURANCE COMPANY; and
ESURANCE PROPERTY AND
CASUALTY INSURANCE COMPANY,

Plaintiffs,

Case No. 19-cv-10579
Hon. Stephen J. Murphy

v.

MICHIGAN PAIN MANAGEMENT
PLLC, DEARBORN PAIN
SPECIALISTS, PLC; SOUTHFIELD
PAIN MANAGEMENT, PLLC;
STERLING HEIGHTS PAIN
MANAGEMENT, PLC; PRECISION
MRI OF MICHIGAN LLC d/b/a
PRECISE MRI; ADVANCED
SURGERY CENTER, LLC; NORTH
SHORE INJURY CENTER, INC.;
MEDI TRANSIT INC.; JAMES
PADULA, D.O.; JONATHAN MAFFIA;
WILLIAM GONTE, M.D.; ELIAS
GOLDSTEIN, D.C.; ALBERT
JEROME, D.C.; FRANCES MADDEN,
M.D.; FATINA MASRI, M.D.;
HAITHAM MASRI, M.D.; ALI FARAJ;
JAMES DEWEESE; and NATHAN
KARRUMI, D.C.,

Defendants.

**ANSWER TO COMPLAINT, AFFIRMATIVE DEFENSES, AND
RELIANCE ON JURY DEMAND BY DEFENDANTS MICHIGAN PAIN
MANAGEMENT, PLLC, DEARBORN PAIN SPECIALISTS, PLC,
STERLING HEIGHTS PAIN MANAGEMENT, PLC, NORTH SHORE
INJURY CENTER, INC, MEDI TRANSIT, INC, JAMES PADULA, DO,
JONATHAN MAFFIA, ELIAS GOLDSTEIN, DC, ALBERT JEROME, DC,
FRANCES MADDEN, MD, ALI FARAJ AND JAMES DEWEESE**

ANSWER TO COMPLAINT

NOW COME Defendants Michigan Pain Management, PLLC (“Michigan Pain”), Dearborn Pain Specialists, PLC (“Dearborn Pain”), Sterling Heights Pain Management, PLC (“Sterling Heights Pain”), North Shore Injury Center, Inc. (“North Shore”), Medi Transit, Inc. (“Medi Transit”), Dr. James Padula, D.O. (“Dr. Padula”), Jonathan Maffia (“Maffia”), Elias Goldstein, D.C. (“Goldstein”), Albert Jerome, D.C. (“Jerome”), and Dr. Frances Madden, M.D. (“Dr. Madden”), Ali Faraj (“Faraj”), and James Deweese (“Deweese”) (together “Defendants”), by and through their attorneys, and for their Answer to Plaintiffs’ Complaint state as follows:

I. INTRODUCTION

1. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

2. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

3. Defendants deny the existence of a “fraudulent scheme” as alleged by Plaintiffs, and deny the remainder of the allegations in this paragraph as untrue.

4. Defendants deny the existence of a “fraudulent scheme” as alleged by Plaintiffs, and deny the remainder of the allegations in this paragraph as untrue.

5. Defendants deny the existence of a “fraudulent objective” as alleged by Plaintiffs, and deny the remainder of the allegations in this paragraph as untrue.

6. Defendants deny the existence of a “predetermined protocol” as alleged by Plaintiffs, and deny the remainder of the allegations in this paragraph as untrue.

7. Defendants deny engaging in “fraudulent billing practices” as alleged by Plaintiffs, and deny the remainder of the allegations in this paragraph as untrue.

8. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the

district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

9. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations of wrongdoing on the part of Defendants, the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

10. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

11. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

12. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations of wrongdoing on the part of Defendants, the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

13. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

14. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

15. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of fraud or other wrongdoing on the part of Defendants, or liability to Plaintiffs for alleged damages, the same are denied as untrue.

16. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

17. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

18. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act

and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

19. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

II. PARTIES

A. Plaintiffs

20. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

21. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

22. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

23. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

24. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

B. Defendants

1. Michigan Pain Management, PLLC

25. Admitted only that Michigan Pain Management, LLC, is a Michigan professional limited liability company.

26. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

27. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

28. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

29. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claim

2. Dearborn Pain Specialists, PLC

30. Admitted only that Dearborn Pain Specialists, PLC, is a Michigan professional limited liability company.

31. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

32. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

33. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

34. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

3. Southfield Pain Management, PLLC

35. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

36. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

37. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

38. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

39. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

4. Sterling Heights Pain Management, PLC

40. Admitted only that Sterling Heights Pain Management, PLC, is a Michigan professional limited liability company.

41. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

42. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

43. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

44. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

5. Precision MRI of Michigan, LLC, d/b/a Precise MRI

45. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

46. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

47. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

48. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

49. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

6. Advanced Surgery Center, LLC

50. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

51. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

52. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

53. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

54. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

7. North Shore Injury Center, Inc.

55. Admitted only that North Shore is a Michigan non-profit corporation.

56. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

57. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

58. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

59. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

8. Medi Transit, Inc.

60. Admitted only that Medi Transit is a Michigan corporation.

61. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

62. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

63. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

64. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

9. James Padula, D.O.

65. Admitted that Dr. Padula is a resident and citizen of the State of Florida.

66. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

67. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the

district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

10. Jonathan Maffia

68. Admitted that Mr. Maffia is a resident and citizen of the State of Michigan.

69. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

70. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

11. William Gonte, M.D.

71. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

72. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

73. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

12. Elias Goldstein, D.C.

74. Admitted that Elias Goldstein is a resident and citizen of the State of Florida.

75. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

76. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

13. Albert Jerome, D.C.

77. Admitted that Albert Jerome is a resident and citizen of the State of Florida.

78. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

79. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

14. Frances Madden, M.D.

80. Admitted that Dr. Madden is a resident and citizen of the State of Michigan.

81. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

82. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

15. Fatina Masri, M.D.

83. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

84. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

85. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

16. Haitham Masri, M.D

86. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

87. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

88. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

17. Ali Faraj

89. Admitted only that Faraj resides in Michigan.

90. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

91. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

18. James Deweese

92. Admitted only that Deweese resides in Florida.

93. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

94. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

19. Natham Karrumi, D.C.

95. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

96. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

97. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

III. JURISDICTION AND VENUE

98. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

99. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

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128. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

129. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

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132. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

133. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

134. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

135. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

136. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

137. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

138. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations of liability or damages owed by Defendants to Plaintiffs, the same are denied as untrue.

139. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

IV. MICHIGAN'S NO FAULT ACT

140. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiff to its strict proofs. For further response, these Plaintiffs engage in unlawful claims handling practices including the institution of form lawsuits similar to the enclosed which violate the Michigan No Fault Act in order to avoid payment (or seek repayment) of valid No-Fault claims.

141. Defendants neither admit nor deny for the reason that this is an improper rendition of what is actually covered under the Michigan No-Fault Act. Defendants rely on the act as set forth in MCLA §500.3101 et seq. and the policies of insurance.

142. Defendants neither admit nor deny for the reason that this is an improper rendition of what is actually covered under the Michigan No-Fault Act. Defendants rely on the act as set forth in MCLA §500.3101 et seq. and the policies of insurance.

143. Defendants neither admit nor deny for the reason that this is an improper rendition of what is actually covered under the Michigan No-Fault Act.

Defendants rely on the act as set forth in MCLA §500.3101 et seq. and the policies of insurance.

144. Defendants neither admit nor deny for the reason that this is an improper rendition of what is actually covered under the Michigan No-Fault Act. Defendants rely on the act as set forth in MCLA §500.3101 et seq. and the policies of insurance.

145. Defendants neither admit nor deny for the reason that this is an improper rendition of what is actually covered under the Michigan No-Fault Act. Defendants rely on the act as set forth in MCLA §500.3101 et seq. and the policies of insurance.

146. Defendants neither admit nor deny for the reason that this is an improper rendition of what is actually covered under the Michigan No-Fault Act. Defendants rely on the act as set forth in MCLA §500.3101 et seq. and the policies of insurance.

147. Defendants neither admit nor deny for the reason that this is an improper rendition of what is actually covered under the Michigan No-Fault Act. Defendants rely on the act as set forth in MCLA §500.3101 et seq. and the policies of insurance. To the extent this paragraph contains implications or allegations of wrongdoing on the part of Defendants, the same are denied as untrue.

148. Defendants neither admit nor deny for the reason that this is an improper rendition of what is actually covered under the Michigan No-Fault Act. Defendants rely on the act as set forth in MCLA §500.3101 et seq. and the policies of insurance. To the extent this paragraph contains implications or allegations of wrongdoing on the part of Defendants, the same are denied as untrue.

149. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

V. BACKGROUND ON DEFENDANTS AND THEIR ALLEGED SCHEME TO DEFRAUD

A. The Defendant Pain Management Clinics

150. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

151. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

152. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

153. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

154. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

155. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

156. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

157. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

158. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

159. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

160. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

161. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

162. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

163. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

164. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

165. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

166. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

167. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

168. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

169. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

170. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

171. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

172. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

173. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

174. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

175. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

176. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

177. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

178. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

179. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

180. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

181. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

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186. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

187. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

188. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

189. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

190. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

191. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

192. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

193. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

194. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

195. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

196. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

197. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

198. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

199. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

200. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

201. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

202. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical

evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

203. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

204. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

205. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

206. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

207. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

208. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

209. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

210. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

211. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

212. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

213. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

214. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

215. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

B. Precise MRI

216. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

217. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

218. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

219. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

220. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

221. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

222. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

223. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

224. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

225. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

C. Advanced Surgery

226. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

227. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

228. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

229. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

230. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

231. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

232. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

233. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

234. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

D. North Shore and Medi Transit

235. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

236. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

237. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

238. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

239. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

240. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

241. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

242. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

243. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

244. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

245. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

246. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

247. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

248. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

249. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

250. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

251. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

252. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

253. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

254. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

VI. ALLEGED BILLING FOR SERVICES NOT RENDERED

255. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

256. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

257. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

258. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

259. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

260. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

A. Alleged Billing for Discectomies Not Performed

261. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

262. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

263. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

264. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

265. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

266. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

267. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

268. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

269. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

270. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

B. Alleged Billing for Video Electroencephalogram Monitoring Not Performed.

271. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

272. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

273. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

274. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

275. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

276. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

277. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

278. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

279. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

280. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

C. Alleged Billing for Epidurograms Not Performed

281. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

282. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

283. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

284. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

285. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

286. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

B. Alleged Specific Examples of Billing for Services Not Rendered

1. Patient T.H. (Claim No. 0298794710)

287. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

288. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

289. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

290. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

291. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

292. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

293. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

294. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

295. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

296. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

297. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

298. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

2. Patient R.J. (Claim No. 0476016084)

299. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

300. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

301. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

302. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

303. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined protocol,” the same are denied as untrue.

304. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

305. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

306. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

307. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

308. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

309. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

310. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

311. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

312. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

313. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

314. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

315. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

316. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

317. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

318. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

319. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

320. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

321. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

322. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

323. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

324. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

325. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

3. Patient R.A. (Claim No. 0380097765)

326. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

327. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

328. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

329. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

330. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

331. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

332. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

333. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

334. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

335. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

336. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

337. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the

district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

338. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

339. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

4. Patient R.C. (Claim No. 0466646130)

340. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

341. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

342. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

343. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

344. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

345. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

346. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

347. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

348. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

349. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

350. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

351. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

352. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

353. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

5. Patient N.S. (Claim No. 0431326032)

354. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

355. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

356. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

357. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

358. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

359. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

360. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

361. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

362. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

363. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

364. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

365. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

366. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

367. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

6. Patient A.C. (Claim No. 0469325617)

368. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

369. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

370. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

371. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

372. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

373. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

374. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

375. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

376. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

377. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

VII. ALLEGED FALSIFIED MEDICAL RECORDS

378. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

379. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

380. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

381. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

382. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

383. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

384. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

385. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

386. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

387. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

388. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

A. Alleged Specific Examples of Falsified Records

1. Patient S.W. (Claim No. 0368276507)

389. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

390. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

391. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

392. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

393. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

394. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

395. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

396. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

397. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

398. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

399. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

400. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

401. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

402. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

2. Patient G.R. (Claim No. 0357449073)

403. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

404. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

405. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

406. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

407. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

408. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

409. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

410. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

411. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “fraudulent treatment protocol,” the same are denied as untrue.

412. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

413. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

414. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

415. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

416. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

417. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

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420. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

421. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

422. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

423. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

424. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

425. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

426. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue.

427. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

428. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

429. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

430. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

431. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

432. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

433. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

434. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

435. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

436. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

437. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

438. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

439. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

440. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the

district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

441. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

442. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

443. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

444. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

3. Patient R.H. (Claim No. 0150229401)

445. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

446. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

447. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

448. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

449. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

450. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

451. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

4. Patient V.I. (Claim No. 0393864673)

452. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

453. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

454. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

455. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

456. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

457. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

458. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

459. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

5. Patient R.I. (Claim No. TXA-0197188)

460. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

461. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

462. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

463. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

464. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

465. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

466. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

467. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

468. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

469. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

470. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

471. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

472. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

473. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

474. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

475. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

476. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

477. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

VIII. ALLEGED UNLAWFUL SOLICITATION

A. Michigan's Anti-Solicitation Laws

478. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

479. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

480. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

481. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

482. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

B. Alleged Improper and Unlawful Methods Used to Solicit Patients

483. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

484. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

485. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

486. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

487. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

488. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

489. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

490. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

491. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

492. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

493. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

494. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

C. Specific Examples of Alleged Patient Solicitation

495. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1. Patient E.F. (Claim No. TXA-0111556)

496. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

497. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

498. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

499. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

500. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

501. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

502. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

503. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

504. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

505. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

506. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

507. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

508. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

2. Patient T.W. (Claim No. 0478301740)

509. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

510. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

511. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

512. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

513. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

514. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

515. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the

district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

516. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

517. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

3. Patients M.D. and T.D. (Claim No. 0410877393)

518. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

519. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

520. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

521. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

522. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

523. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

524. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

525. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

526. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

527. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

528. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

529. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

530. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

531. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part

of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue.

532. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

533. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

534. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

535. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

536. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

4. Patients M.D. and T.D. (Claim No. 0437651847)

537. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

538. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

539. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

540. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

541. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

542. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

543. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

544. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

5. Patient M.A. (Claim No. 048512000)

545. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

546. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

547. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

548. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

549. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

550. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

551. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

552. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

553. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

554. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

555. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

6. Patient H.L. (Claim No. 0442588398)

556. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

557. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

558. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

559. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part

of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue.

560. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue.

561. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

562. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue.

563. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

564. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

565. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

566. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

567. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

568. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

569. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

7. Patient P.A. (Claim No. ATL-0136464)

570. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

571. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

572. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

573. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

574. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

575. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined protocol of excessive and unnecessary treatment,” the same are denied as untrue.

576. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

577. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

578. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

579. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

IX. ALLEGED IMPROPER INDUCEMENTS AND KICKBACKS

A. Alleged Improper Inducements to Patients

580. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

581. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical

evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

582. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

583. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

584. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

585. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

586. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

587. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

588. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

589. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

590. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

591. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

592. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

593. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

594. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

595. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

596. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

597. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

598. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

599. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

600. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

601. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

602. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

603. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

604. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

605. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

606. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

607. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

608. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

609. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

610. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

B. Additional Alleged Kickbacks and Referral Agreements

611. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

612. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

613. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

614. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

615. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

616. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

617. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

618. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

619. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

620. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

621. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

622. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

623. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

624. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

625. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

X. ALLEGED UNREASONABLE AND UNNECESSARY MEDICAL TREATMENT

626. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

627. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

628. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

629. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

630. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

631. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the

extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

632. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

633. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

A. Alleged “Predetermined Treatment Protocol”

634. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is

not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

635. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1. Pain Management Entities Alleged Predetermined Treatment Protocol

636. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations

initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

637. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

638. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

639. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

640. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

641. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

642. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

643. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

644. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

645. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

646. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

647. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

648. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

649. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

650. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

651. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

652. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

653. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

654. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

655. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue.

656. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

657. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

658. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or that Defendants somehow caused the “opioid problem in Michigan,” the same are denied as untrue.

659. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants or that Defendants somehow caused the “opioid problem in Michigan,” the same are denied as untrue.

660. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or that Defendants somehow caused the “opioid problem in Michigan,” the same are denied as untrue.

661. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or that Defendants somehow caused the “opioid problem in Michigan” or “recklessly” prescribed medication, the same are denied as untrue.

662. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue.

663. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol” or improper issuance of disability certificates, the same are denied as untrue.

664. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol” or improper issuance of disability certificates, the same are denied as untrue.

665. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

666. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

667. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

668. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

669. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

670. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

671. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the improper use of a “boilerplate and template medical records,” the same are denied as untrue.

2. North Shore Predetermined Treatment Protocol

672. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

673. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol” or improper issuance of disability certificates, the same are denied as untrue.

674. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol” or improper issuance of disability certificates, the same are denied as untrue.

675. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

676. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

677. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

678. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

679. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

680. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

681. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

682. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law. As to the allegations of wrongdoing made against Defendants, the same are denied as untrue.

683. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law. As to the allegations of wrongdoing made against Defendants, the same are denied as untrue.

684. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

685. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

686. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

687. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

688. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

689. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

690. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

691. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

692. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

693. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

694. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

695. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

696. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

697. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

698. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

699. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

700. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

701. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

702. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

703. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

704. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

705. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

706. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

707. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

708. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

709. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

710. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

711. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law or standard of care. As to the allegations of wrongdoing made against Defendants, the same are denied as untrue.

712. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

713. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

714. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

715. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

716. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

717. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

718. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

719. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

B. Alleged Unnecessary and Excessive Application of Useless P-Stim Devices

720. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

721. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

722. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

723. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

724. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

725. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1. According to Allstate, P-Stim is Not Generally Accepted by the Medical Community

726. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

727. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

728. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

729. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

730. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

731. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

732. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

733. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

734. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

735. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

736. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

737. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

738. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

739. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

740. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

741. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

742. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

743. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

2. Alleged Unnecessary Use of Surgical Centers

744. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

745. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

746. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

747. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

748. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

749. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

750. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

751. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

752. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

753. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

754. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

755. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

756. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

757. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

C. Alleged Excessive and Medically Unnecessary MRIs

758. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue.

759. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

760. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

761. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

762. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

763. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

764. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

765. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

766. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

767. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

768. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

769. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

770. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

771. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

772. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

773. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

774. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

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776. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

777. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

778. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

779. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

780. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1. Alleged Performance of Medically Unnecessary MRIs

a. Standard of Care for MRI Testing

781. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

782. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

783. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

784. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

785. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

786. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

787. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

788. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

789. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

790. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

791. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

792. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

793. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

794. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

795. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

796. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

797. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

798. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

799. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

800. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

801. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

802. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

803. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

b. MRIs Performed During Initial Stages of Treatment

804. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

805. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

806. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

807. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

808. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

809. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

810. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

811. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

812. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

813. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

814. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

815. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

816. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

817. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

818. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

c. Excessive MRI Scans

819. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

820. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

821. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

822. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

823. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

824. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

825. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

826. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

827. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

828. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

829. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

830. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

831. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

832. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

833. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

834. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

D. Alleged Fraudulent and Unnecessary Use of Other Diagnostic Testing

835. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1. Alleged Fraudulent Comparative Muscle and Range of Motion Testing

836. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

837. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

838. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

839. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

840. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

841. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

842. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

843. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

844. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

845. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

846. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

847. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

848. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

849. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

850. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

851. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

852. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

853. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

854. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

855. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

856. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

857. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

2. Alleged Fraudulent Ambulatory Electroencephalograms

858. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

859. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

860. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

861. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

862. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

863. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

864. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

865. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

866. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

867. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

868. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

869. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

870. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

871. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

872. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

873. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

874. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

875. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

876. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

3. Alleged Fraudulent Electrodiagnostic Testing

877. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

878. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

879. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

880. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

881. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

882. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

883. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

884. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

885. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

886. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

887. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

888. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

**a. ALLEGED Unlawful EMG and NCS Testing by
Unlicensed Personnel**

889. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

890. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

891. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

892. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law. As to the allegations of wrongdoing made against Defendants, the same are denied as untrue.

893. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

894. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

895. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

896. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

897. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

b. ALLEGED Unnecessary and Unjustified EMG and NCS Testing

898. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

899. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

900. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

901. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

902. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

903. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

904. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

905. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

906. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

907. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical

evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

c. ALLEGED Use of a “Predetermined Protocol” for Electrodiagnostic Testing

908. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

909. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

910. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

911. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

912. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

913. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

914. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

E. Alleged Medically Unnecessary Injections and Other Procedures

915. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

916. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

917. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

918. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

919. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

920. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

921. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

922. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

923. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

924. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

925. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

926. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

927. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

928. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

929. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

930. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

931. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

932. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

933. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

934. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

935. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

936. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

937. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

938. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

939. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

940. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

941. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

942. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

943. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

944. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

945. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

946. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

947. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

948. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

949. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

950. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

951. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

952. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

953. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

954. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

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957. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

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960. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

961. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

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963. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

F. Alleged Unnecessary Transportation Services

964. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

965. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

966. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

967. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

968. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

969. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

970. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the

district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

971. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

972. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

973. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

974. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

975. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

976. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

977. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

978. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

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980. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

G. Specific Examples of Alleged Unreasonable and Unnecessary Evaluation, Treatment, and Testing

981. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1. Patient R.M. (Claim No. 0391112521)

982. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

983. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

984. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

985. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

986. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

987. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

988. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

989. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

990. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

991. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

992. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

993. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

994. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

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996. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

997. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

998. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

999. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1000. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1001. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

2. Patient E.C. (Claim No. 0444334346)

1002. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1003. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1004. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1005. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1006. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1007. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1008. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1009. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1010. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1011. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1012. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1013. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1014. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1015. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1016. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1017. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1018. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

3. Patient M.Y. (Claim No. 0422477315)

1019. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1020. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1021. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1022. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1023. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1024. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1025. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1026. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1027. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1028. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1029. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1030. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1031. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1032. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1033. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1034. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1035. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1036. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1037. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

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1039. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1040. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1041. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1042. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1043. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1044. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

4. Patient B.K. (Claim No. 0454414953)

1045. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1046. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1047. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1048. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1049. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1050. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1051. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1052. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1053. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1054. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1055. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1056. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

5. Patient E.L. (Claim No. 0397904939)

1057. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1058. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1059. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1060. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1061. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1062. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1063. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1064. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1065. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1066. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

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1067. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1068. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1069. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1070. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1071. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1072. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1073. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1074. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1075. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1076. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

6. Patient D.S. (Claim No. 0355492943)

1077. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1078. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1079. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1080. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1081. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1082. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1083. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1084. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1085. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1086. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1087. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1088. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1089. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1090. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1091. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1092. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1093. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

7. Patient M.A. (Claim No. TXA-0192872)

1094. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1095. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1096. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1097. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1098. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1099. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1100. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1101. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1102. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1103. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1104. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1105. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1106. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1107. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1108. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1109. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1110. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1111. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1112. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1113. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical

evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1114. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

XI. ALLEGED FRAUDULENT BILLING PRACTICES

1115. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1116. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1117. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1118. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1119. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1120. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

A. Alleged Improper Billing for Evaluations

1. Allegedly Fraudulently Upcoded Offices Visits

1121. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1122. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1123. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1124. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1125. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1126. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1127. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1128. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1129. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1130. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1131. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1132. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1133. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1134. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

2. Alleged Fraudulent Billing for Evaluations During Global Post-Surgery Periods

1135. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1136. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1137. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1138. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1139. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1140. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1141. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1142. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

3. Alleged Fraudulent Billing for Evaluations During Planned Procedures

1143. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1144. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1145. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1146. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1147. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1148. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1149. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1150. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1151. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

B. Alleged Fraudulent Billing for P-Stim Application

1152. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1153. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1154. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1155. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1156. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1157. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1158. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1159. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1160. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1161. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1162. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1163. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1164. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1165. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1166. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1167. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1168. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1169. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1170. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1171. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1172. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1173. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1174. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1175. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1176. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1177. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1178. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

C. Alleged Fraudulent Billing for Procedures

1179. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1. Alleged Fraudulent Billing for Fluoroscopy

1180. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1181. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1182. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1183. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1184. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1185. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1186. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1187. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1188. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1189. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1190. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1191. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1192. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1193. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1194. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1195. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1196. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

2. Alleged Other Fraudulent Billing in Connection with Procedures

1197. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1198. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1199. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1200. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1201. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1202. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1203. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1204. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1205. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1206. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1207. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1208. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1209. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1210. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1211. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1212. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

D. Alleged Fraudulent Billing for Durable Medical Equipment

1213. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “predetermined treatment protocol,” the same are denied as untrue.

1214. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1215. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1216. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1217. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1218. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1219. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1220. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

XII. ALLSTATE ALLEGES THAT DEFENDANTS' CHARGES ARE UNREASONABLE AND NOT CUSTOMARY

A. Charges Submitted by Precise MRI

1. Precise MRI's Representations Regarding Cost and Revenue

1221. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1222. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1223. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1224. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1225. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1226. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1227. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1228. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1229. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1230. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

2. Precise MRI's Charges to Allstate

1231. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1232. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1233. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1234. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1235. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1236. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1237. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1238. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1239. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1240. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1241. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1242. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

3. Allstate Alleges That Precise MRIs' Charges Far Exceed the Amounts Paid by Other Michigan Payors

1243. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1244. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1245. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1246. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1247. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1248. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1249. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

4. Allstate Alleges That Precise MRI Charges Allstate More Than Other Payors

1250. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

1251. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

1252. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1253. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1254. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1255. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1256. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1257. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

B. Charges Submitted by the Pain Management Clinics

1258. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1259. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1260. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1261. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1262. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1263. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1264. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1265. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1266. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1267. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1268. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

C. Charges Submitted by Advanced Surgery

1269. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1270. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1271. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1272. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1273. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1274. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1275. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1276. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1277. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1278. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1279. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1280. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1281. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1282. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

D. Charges for Transportation Services

1283. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1284. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1285. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1286. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1287. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1288. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1289. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1290. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1291. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1292. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

XIII. ALLEGED MISREPRESENTATIONS MADE BY THE DEFENDANTS AND RELIED ON BY ALLSTATE

A. Alleged Misrepresentations by the Defendants

1293. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1294. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

1295. Defendants neither admit nor deny for the reason that this is an improper or incomplete rendition of the referenced law.

1296. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1297. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1298. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1299. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1300. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1301. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1302. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1303. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1304. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1305. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1306. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical

evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1307. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1308. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

B. Allstate's Alleged Justifiable Reliance

1309. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1310. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1311. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1312. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1313. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1314. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1315. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1316. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

XIV. ALLEGED MAIL AND WIRE FRAUD RACKETEERING ACTIVITY

1317. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical

evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1318. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1319. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1320. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1321. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1322. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1323. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1324. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1325. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1326. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1327. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or the existence of a “fraudulent billing scheme,” the same are denied as untrue.

1328. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1329. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1330. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1331. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1332. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical

evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1333. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1334. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1335. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1336. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1337. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1338. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

XV. ALLSTATE'S ALLEGED DAMAGES

1339. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1340. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1341. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1342. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1343. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1344. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1345. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1346. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1347. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1348. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1349. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1350. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1351. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1352. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1353. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1354. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1355. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

1356. In the manner and form stated, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or liability for damages in any amount to Plaintiffs, the same are denied as untrue.

XVI. CAUSES OF ACTION

COUNT I VIOLATION OF 18 U.S.C. § 1962(c) (Michigan Pain Enterprise)

Against Precision MRI of Michigan LLC d/b/a Precise MRI; Advanced Surgery Center, LLC; North Shore Injury Center, Inc.; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.; Elias Goldstein, D.C.; Albert Jerome, D.C.; Frances Madden, M.D.; Fatina Masri, M.D.; Haitham Masri, M.D.; James Deweese; and Natham Karrumi, D.C.

1357. Defendants repeat and re-allege those answers given above as if fully restated herein.

1358. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1359. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1360. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1361. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1362. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1363. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1364. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1365. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this

lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1366. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1367. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1368. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1369. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1370. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1371. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1372. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1373. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1374. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1375. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1376. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1377. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT II
VIOLATION OF 18 U.S.C. § 1962(d)
(Michigan Pain Enterprise) Against Precision MRI of Michigan LLC
d/b/a Precise MRI; Advanced Surgery Center, LLC; North Shore
Injury Center, Inc.; James Padula, D.O.; Jonathan Maffia; William
Gonte, M.D.; Elias Goldstein, D.C.; Albert Jerome, D.C.; Frances
Madden, M.D.; Fatina Masri, M.D.; Haitham Masri, M.D.; James
Deweese; and Natham Karrumi, D.C.

1378. Defendants repeat and re-allege those answers given above as if fully restated herein.

1379. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1380. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1381. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1382. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1383. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1384. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1385. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT III
VIOLATION OF 18 U.S.C. § 1962(c)
(Dearborn Pain Enterprise)

Against Precision MRI of Michigan LLC d/b/a Precise MRI; Advanced Surgery Center, LLC; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.; Elias Goldstein, D.C.; Albert Jerome, D.C.; Fatina Masri, M.D.; Haitham Masri, M.D.; and Natham Karrumi, D.C.

1386. Defendants repeat and re-allege those answers given above as if fully restated herein.

1387. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1388. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1389. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1390. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and

is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1391. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1392. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1393. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1394. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1395. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1396. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1397. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1398. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1399. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1400. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1401. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1402. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1403. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1404. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1405. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1406. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1407. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT IV
VIOLATION OF 18 U.S.C. § 1962(d)
(Dearborn Pain Enterprise)
Against Precision MRI of Michigan LLC d/b/a Precise MRI; Advanced
Surgery Center, LLC; James Padula, D.O.; Jonathan Maffia; William Gonte,
M.D.; Elias Goldstein, D.C.; Albert Jerome, D.C.; Fatina Masri, M.D.;
Haitham Masri, M.D.; and Natham Karrumi, D.C.

1408. Defendants repeat and re-allege those answers given above as if fully restated herein.

1409. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1410. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1411. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1412. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1413. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1414. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1415. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT V
VIOLATION OF 18 U.S.C. § 1962(c)
(Southfield Pain Enterprise)

Against Michigan Pain Management PLLC; Precision MRI of Michigan LLC d/b/a Precise MRI; Advanced Surgery Center, LLC; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.; Elias Goldstein, D.C.; Albert Jerome, D.C.; Fatina Masri, M.D.; Haitham Masri, M.D.; and Natham Karrumi, D.C.

1416. Defendants repeat and re-allege those answers given above as if fully restated herein.

1417. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1418. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1419. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1420. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1421. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and

is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1422. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1423. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1424. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1425. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1426. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1427. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1428. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1429. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1430. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this

paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1431. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1432. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1433. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1434. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and

is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1435. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1436. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT VI
VIOLATION OF 18 U.S.C. § 1962(d)
(Southfield Pain Enterprise)

Against Michigan Pain Management PLLC; Precision MRI of Michigan LLC d/b/a Precise MRI; Advanced Surgery Center, LLC; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.; Elias Goldstein, D.C.; Albert Jerome, D.C.; Fatina Masri, M.D.; Haitham Masri, M.D.; and Natham Karrumi, D.C.

1437. Defendants repeat and re-allege those answers given above as if fully restated herein.

1438. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1439. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1440. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1441. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1442. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1443. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1444. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT VII
VIOLATION OF 18 U.S.C. § 1962(c)
(Sterling Heights Pain Enterprise)

Against Precision MRI of Michigan LLC d/b/a Precise MRI; James Padula, D.O.; Jonathan Maffia; Elias Goldstein, D.C.; Albert Jerome, D.C.; Frances Madden, M.D.; and Natham Karrumi, D.C.

1445. Defendants repeat and re-allege those answers given above as if fully restated herein.

1446. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1447. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1448. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1449. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1450. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1451. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this

lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1452. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1453. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1454. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1455. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this

lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1456. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1457. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1458. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1459. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1460. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1461. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1462. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1463. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1464. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this

paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1465. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT VIII
VIOLATION OF 18 U.S.C. § 1962(d)
(Sterling Heights Pain Enterprise)
Against Precision MRI of Michigan LLC d/b/a Precise MRI; James Padula,
D.O.; Jonathan Maffia; Elias Goldstein, D.C.; Albert Jerome, D.C.; Frances
Madden, M.D.; and Natham Karrumi, D.C.

1466. Defendants repeat and re-allege those answers given above as if fully restated herein.

1467. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1468. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1469. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1470. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1471. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1472. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1473. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT IX
VIOLATION OF 18 U.S.C. § 1962(c)
(Precise MRI Enterprise)

**Against Michigan Pain Management PLLC; Dearborn Pain Specialists, PLC;
Southfield Pain Management, PLLC; Sterling Heights Pain Management,
PLLC; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.; Elias
Goldstein, D.C.; Albert Jerome, D.C.; Frances Madden, M.D.; and Natham
Karrumi, D.C.**

1474. Defendants repeat and re-allege those answers given above as if fully restated herein.

1475. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1476. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1477. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1478. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1479. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1480. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1481. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1482. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act

and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1483. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1484. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1485. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1486. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1487. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1488. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1489. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and

is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1490. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1491. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1492. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1493. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT X
VIOLATION OF 18 U.S.C. § 1962(d)
(Precise MRI Enterprise)

**Against Michigan Pain Management PLLC; Dearborn Pain Specialists, PLC;
Southfield Pain Management, PLLC; Sterling Heights Pain Management,
PLLC; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.; Elias
Goldstein, D.C.; Albert Jerome, D.C.; Frances Madden, M.D.; and Natham
Karrumi, D.C.**

1494. Defendants repeat and re-allege those answers given above as if fully restated herein.

1495. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1496. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1497. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1498. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1499. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1500. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1501. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT XI
VIOLATION OF 18 U.S.C. § 1962(c)
(Advanced Surgery Enterprise)

**Against Michigan Pain Management PLLC; Dearborn Pain Specialists, PLC;
Southfield Pain Management, PLLC; Precision MRI of Michigan LLC d/b/a
Precise MRI; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.;
Elias Goldstein, D.C.; Albert Jerome, D.C.; Frances Madden, M.D.; Fatina
Masri, M.D.; Haitham Masri, M.D.; and Natham Karrumi, D.C.**

1502. Defendants repeat and re-allege those answers given above as if fully restated herein.

1503. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1504. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1505. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1506. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1507. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1508. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1509. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1510. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this

paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1511. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1512. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1513. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1514. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1515. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1516. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1517. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1518. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and

is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1519. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1520. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1521. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this

paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1522. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT XII
VIOLATION OF 18 U.S.C. § 1962(d)
(Advanced Surgery Enterprise)

**Against Michigan Pain Management PLLC; Dearborn Pain Specialists, PLC;
Southfield Pain Management, PLLC; Precision MRI of Michigan LLC d/b/a
Precise MRI; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.;
Elias Goldstein, D.C.; Albert Jerome, D.C.; Frances Madden, M.D.; Fatina
Masri, M.D.; Haitham Masri, M.D.; and Natham Karrumi, D.C.**

1523. Defendants repeat and re-allege those answers given above as if fully restated herein.

1524. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1525. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1526. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1527. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1528. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1529. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1530. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT XIII
VIOLATION OF 18 U.S.C. § 1962(c)
(North Shore Enterprise)

Against Michigan Pain Management PLLC; Medi Transit Inc.; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.; Elias Goldstein, D.C.; Albert Jerome, D.C.; Ali Faraj; and James Deweese

1531. Defendants repeat and re-allege those answers given above as if fully restated herein.

1532. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1533. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1534. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1535. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1536. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1537. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1538. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1539. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this

paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1540. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1541. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1542. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1543. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1544. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1545. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1546. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1547. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1548. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1549. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1550. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this

paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1551. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs

**COUNT XIV
VIOLATION OF 18 U.S.C. § 1962(d)
(North Shore Enterprise)**

Against Michigan Pain Management PLLC; Medi Transit Inc.; James Padula, D.O.; Jonathan Maffia; William Gonte, M.D.; Elias Goldstein, D.C.; Albert Jerome, D.C.; Ali Faraj; and James Deweese

1552. Defendants repeat and re-allege those answers given above as if fully restated herein.

1553. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1554. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1555. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1556. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1557. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1558. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1559. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT XV
VIOLATION OF 18 U.S.C. § 1962(c)
(Medi Transit Enterprise)
Against North Shore Injury Center, Inc.; William Gonte, M.D.; Ali Faraj;
and James Deweese

1560. Defendants repeat and re-allege those answers given above as if fully restated herein.

1561. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1562. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1563. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1564. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1565. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1566. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1567. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1568. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this

paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1569. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1570. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1571. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1572. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1573. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1574. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1575. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1576. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1577. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1578. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1579. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs

COUNT XVI
VIOLATION OF 18 U.S.C. § 1962(d)
(Medi Transit Enterprise)
Against North Shore Injury Center, Inc.; William Gonte, M.D.; Ali
Faraj; and James Deweese

1580. Defendants repeat and re-allege those answers given above as if fully restated herein.

1581. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1582. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1583. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1584. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1585. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1586. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1587. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

COUNT XVII
COMMON LAW FRAUD
Against All Defendants

1588. Defendants repeat and re-allege those answers given above as if fully restated herein.

1589. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1590. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1591. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1592. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1593. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1594. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1595. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT XVIII
CIVIL CONSPIRACY
Against All Defendants

1596. Defendants repeat and re-allege those answers given above as if fully restated herein.

1597. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1598. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1599. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1600. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1601. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1602. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1603. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1604. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT XIX
PAYMENT UNDER MISTAKE OF FACT
Against Michigan Pain Management PLLC; Dearborn Pain Specialists, PLC;
Southfield Pain Management, PLLC; Sterling Heights Pain Management,
PLC; Precision MRI of Michigan LLC d/b/a Precise MRI; Advanced Surgery
Center, LLC; North Shore Injury Center, Inc.; and Medi Transit Inc.

1605. Defendants repeat and re-allege those answers given above as if fully restated herein.

1606. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1607. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1608. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1609. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT XX
UNJUST ENRICHMENT

**Against Michigan Pain Management PLLC; Dearborn Pain Specialists, PLC;
Southfield Pain Management, PLLC; Sterling Heights Pain Management,
PLC; Precision MRI of Michigan LLC d/b/a Precise MRI; Advanced Surgery
Center, LLC; North Shore Injury Center, Inc.; and Medi Transit Inc.**

1610. Defendants repeat and re-allege those answers given above as if fully restated herein.

1611. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this

paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1612. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1613. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1614. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1615. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

COUNT XXI
DECLARATORY RELIEF PURSUANT TO 28 U.S.C. § 2201
Against All Defendants

1616. Defendants repeat and re-allege those answers given above as if more fully restated herein.

1617. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1618. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1619. In the manner and form alleged, Defendants neither admit nor deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1620. In the manner and form alleged, Defendants neither admit nor deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1621. In the manner and form alleged, Defendants neither admit nor deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1622. In the manner and form alleged, Defendants neither admit nor deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1623. In the manner and form alleged, Defendants neither admit nor deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1624. In the manner and form alleged, Defendants deny the allegations contained in this paragraph and leave Plaintiffs to their strict proofs.

1625. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1626. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1627. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district

against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1628. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

1629. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by these Plaintiffs throughout the district against healthcare providers, is not supported by any factual medical evidence and is created entirely by the Plaintiffs in order to circumvent the Michigan No-Fault Act

and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations of damages or liability to Plaintiffs on the part of Defendants, the same are denied as untrue.

XVII. RESPONSE TO ALLSTATE'S DEMAND FOR RELIEF

WHEREFORE, Defendants pray this action be dismissed in its entirety, the relief requested by Plaintiffs be denied, and that Defendants be awarded their costs, interest, and attorney fees so wrongfully sustained for having to defend this baseless claim, which attempts to circumvent the No Fault Act and avoid Plaintiff's statutory responsibility under such Act, and such other and further relief as is consistent with equity and good conscience.

DEMAND FOR JURY TRIAL

Defendants hereby demand a trial by jury and rely upon the Demand for Jury Trial made by Plaintiffs in the Complaint.

DEFENDANTS' AFFIRMATIVE DEFENSES TO COMPLAINT

NOW COME Defendants Michigan Pain Management, PLLC ("Michigan Pain"), Dearborn Pain Specialists, PLC ("Dearborn Pain"), Sterling Heights Pain Management, PLC ("Sterling Heights Pain"), North Shore Injury Center, Inc. ("North Shore"), Medi Transit, Inc. ("Medi Transit"), Dr. James Padula, D.O. ("Dr. Padula"), Jonathan Maffia ("Maffia"), Elias Goldstein, D.C. ("Goldstein"), Albert

Jerome, D.C. (“Jerome”), and Dr. Frances Madden, M.D. (“Dr. Madden”), Ali Faraj (“Faraj”), and James Deweese (“Deweese”) (together “Defendants”), by and through their attorneys, and for their Affirmative Defenses state as follows:

1. Plaintiffs’ Complaint is subject to dismissal, in whole or in part, for the reason that Plaintiffs failed to sufficiently plead a cause of action in accordance with state and/or federal rules.

2. Plaintiffs’ Complaint is subject to dismissal, in whole or in part, based upon the applicable statute of limitations, laches, statute of repose and/or the “one year back” statute of limitations set forth in MCL 500.3145(1).

3. Plaintiffs’ Complaint is subject to dismissal, in whole or in part, for the reason that Plaintiffs lack standing pursuant to the clear and ambiguous language of MCL 500.4501, et seq.

4. Plaintiffs’ Complaint is subject to dismissal, in whole or in part, for the reason that Plaintiffs’ Complaint fails to state a claim upon which relief can be granted.

5. Plaintiffs’ Complaint is subject to dismissal, in whole or in part, for the reason that Plaintiffs cannot show "reasonable reliance" under the standard established in *Cooper v. Auto Club Insurance Assoc.*, 481 Mich. 399; 751 N.W.2d 443 (2008) and *Johnson v Wausau Ins Co.*, 283 Mich App 636, 769 NW2d 755 (2009).

6. Plaintiffs' Complaint is subject to dismissal, in whole or in part, pursuant to MCL 500.3175 for a multitude of reasons, including but not limited to the fact that the statute of limitations has expired and Plaintiffs lack standing to assert any claim for the recovery of benefits paid for the benefit of an individual assigned to Allstate for coverage and for which Allstate has received reimbursement from the Assigned Claims Facility.

7. Plaintiffs' Complaint is subject to dismissal, in whole or in part, for the reason that Plaintiffs' Complaint contains claims which are actually medical negligence claims and Plaintiffs lack standing to pursue such claims; failed to comply with any applicable pre-suit notice requirements; failed to attach required affidavits from qualified health care practitioners and otherwise failed to properly plead or preserve any cause of action which depends upon Defendants' failure adhere to applicable professional standards.

8. Plaintiffs' Complaint is subject to dismissal, in whole or in part, based upon the doctrines of unclean hands, promissory estoppel, laches, equitable estoppel, comparative negligence, immunity, assumption of the risk, compromise and settlement, release, election of remedies, failure to join claims or defenses in other litigation, failure to mitigate its damages, the fact that Plaintiffs are not the real parties in interest, and waiver.

9. Plaintiffs' Complaint is subject to dismissal, in whole or in part, under the doctrines of res judicata and/or collateral estoppel.

10. Plaintiffs' Complaint is subject to dismissal, in whole or in part, by the Economic Loss Rule/Doctrine.

11. Plaintiffs' Complaint is subject to dismissal, in whole or in part, pursuant to the Doctrine of Election of Remedies.

12. Plaintiffs' Complaint is subject to dismissal, in whole or in part, based upon prior judgment, release, settlement, arbitration or other resolution of claims between Plaintiffs and individual claimants for which Plaintiffs are now seeking reimbursement.

13. Plaintiffs' claims may be barred by their own prior breaches of contract, failure to timely exercise due care, violations of statutory obligations, violations of their duty of good faith and fair dealing, interferences and by their unclean hands and inequitable conduct.

14. Plaintiffs lack standing to assert some or all of the allegations made against Defendants regarding illegality and/or the unlawful providing of services. (*Allstate Ins Co v Global Medical Billing, Inc, et al, US Dist Court, ED Mich, Southern Division, Case No. 09-14975, Hon. Lawrence P. Zatkoff*).

15. Plaintiffs have failed to mitigate their damages.

16. That, assuming any of Plaintiffs' allegations are true, which is denied in its entirety, Plaintiffs have failed to mitigate their damages by unreasonably continuing to issue payments to Defendants when Plaintiffs reasonably knew or should have known that such payments were not warranted pursuant to the holdings in *Cooper v. ACIA*, 481 Mich. 399, 751 N.W.2d 443 (2008).

17. Plaintiffs' claims against these Defendants are improperly joined.

18. Plaintiffs' claims are barred pursuant to MCL 500.3112.

19. To the extent Plaintiffs' claims result from the actions or inactions of other parties or defendant(s), Defendants have no liability for such actions/inactions.

20. Defendants are entitled to attorney fees per MCL 500.3148. Defendants reserve all defenses set forth in MCL 500.3101, et seq.

21. Defendants did not make any misrepresentations nor commit fraud.

22. Defendants did not pursue any amount greater than that which Plaintiffs determined was reasonable and customary for the services provided to the subject patients.

23. Plaintiffs' claim for declaratory relief pursuant to 28 U.S.C. §2201 is an attempt to circumvent the statutory scheme set forth in MCL 500.3101, et seq.

24. Plaintiffs' exclusive remedy for the actions alleged against Defendants are controlled by the regulatory procedures set forth in MCL 500.3101, et seq.

25. Defendants reserve the right to alter, amend or supplement these Affirmative Defenses, and to bring any counterclaims, cross claims and/or third party claims, during or upon the completion of discovery, said reservations being necessary because the allegations in the Complaint do not offer sufficient specifics to notify said Defendants of the nature of the claims being made against them.

WHEREFORE, Defendants pray this action be dismissed in its entirety, the relief requested by Plaintiffs be denied, and that Defendants be awarded their costs, interest, and attorney fees so wrongfully sustained for having to defend this baseless claim, which attempts to circumvent the No Fault Act and avoid Plaintiff's statutory responsibility under such Act, and such other and further relief as is consistent with equity and good conscience.

Respectfully submitted,

JOELSON ROSENBERG PLC

/s/ Peter W. Joelson

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(248) 626-9966 fax: (248) 855-9496

LAW OFFICES OF GARY R. BLUMBERG,
PC

/s/ Gary R. Blumberg

Gary R. Blumberg (P29820)

grblumberg@blumbergpc.com

Co-Attorneys for Defendants

15011 Michigan Ave.

Dearborn, MI 48126

(313) 230-1121

Dated: April 29, 2019

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document along with a Certificate of Service was electronically filed on April 29, 2019 with the Court's e-filing system, which will send notification of such filing to all attorneys of record.

/s/ Emily R. Warren
Emily R. Warren